

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION

RCVD - USDC COLA SC  
DEC 1 '23 PM4:02

3:23-cv-6187-DCC-MGB

**AFFIDAVIT FOR CRIMINAL CONSPIRACY**

18 U.S.C. 241 AND 242

The affiant, Patrick Lee Booker, who, does solemnly swear and deposes the following facts:

On April 7, 2010, Jean Toal, Chief Justice, South Carolina Supreme Court, in her official capacity; did conspire by and between, Costa Pleicones, Associate Justice, South Carolina Supreme Court, in his official capacity; Donald Beatty, Associate Justice, South Carolina Supreme Court, in his official capacity; John Kittredge, Associate Justice, South Carolina Supreme Court, in his official capacity; and Kaye Hearn, Associate Justice, South Carolina Supreme Court, in her official capacity; while acting under the color of law, did, within the district and State of South Carolina, violate the criminal laws of the United States in the following particulars:

**Conspiracy Against Rights of Citizens (18 U.S.C. §241).**

Affiant further attest and states that there is sufficient probable cause to assume that Jean Toal, Chief Justice, South Carolina Supreme Court, in her official capacity; Costa Pleicones, Associate Justice, South Carolina Supreme Court, in his official capacity; Donald Beatty, Associate Justice, South Carolina Supreme Court, in his

official capacity; John Kittredge, Associate Justice, South Carolina Supreme Court, in his official capacity; and Kaye Hearn, Associate Justice, South Carolina Supreme Court, in her official capacity; while acting under the color of law, did, within the district and State of South Carolina, violate the criminal laws of the United States in the following particulars:

**Deprivation of Rights Under Color of Law (18 U.S.C. §242).**

Affiant does set forth the following facts:

That on April 7, 2010, while at the South Carolina Supreme Court building, acting without jurisdiction for want of due process, Jean Toal, Chief Justice, South Carolina Supreme Court, in her official capacity; Costa Pleicones, Associate Justice, South Carolina Supreme Court, in his official capacity; Donald Beatty, Associate Justice, South Carolina Supreme Court, in his official capacity; John Kittredge, Associate Justice, South Carolina Supreme Court, in his official capacity; and Kaye Hearn, Associate Justice, South Carolina Supreme Court, in her official capacity; did commit the federal and state offense of Conspiracy Against Rights of Citizens and Deprivation of Rights Under Color of Law, in violation of sections 18 U.S.C. 241 and 242 in that they did band and conspire together to hinder, prevent, or obstruct a citizen of the United States, Patrick Lee Booker, in the free exercise and enjoyment

of his right & privilege—to Due Process and Equal Protection---secured to him by the Constitution of the United States and obligated to the State of South Carolina *when they entered an Order restricting the exercise of his rights without affording Patrick Lee Booker any due process or equal protection of the law.*

This act was against the peace and dignity of the United States by a State subjected to the jurisdiction thereof.

I, Patrick Lee Booker, verify under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct. See 28 U.S.C. 1746.

EXECUTED AT GREENWOOD, SOUTH CAROLINA THIS 1<sup>st</sup> day of December 2023.

A handwritten signature in cursive script, reading "Patrick L. Booker", is written over a horizontal line.

**Patrick L. Booker**  
Petitioner, Sui Juris  
Citizen of the United States of America